

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

IOENGINE, LLC  Plaintiff/Counterclaim Defendant,  v.  PAYPAL HOLDINGS, INC.,  Defendant/Counterclaim Plaintiff.	C.A. No. 18-452-WCB
INGENICO INC.,  Plaintiff,  v.  IOENGINE, LLC,  Defendant.	C.A. No. 18-826-WCB
IOENGINE, LLC,  Counterclaim Plaintiff,  v.  INGENICO, INC., INGENICO CORP., and INGENICO GROUP S.A.,  Counterclaim Defendants.	

**JOINT DAUBERT MOTION TO EXCLUDE THE TESTIMONY OF DR. STEC**

PayPal Holding, Inc. (“PayPal”) and Ingenico, Inc., Ingenico Corp., and Ingenico Group S.A. (collectively, “Ingenico” and together with PayPal, “Defendants”) respectfully move for an order excluding the testimony of Dr. Jeffrey A. Stec for failure to apportion, improper reliance on

a non-comparable license, and improper reliance on jury verdicts.<sup>1</sup> The grounds for this motion are set forth in PayPal and Ingenico's Opening Brief in Support of Their Motions for Summary Judgment and Daubert Motions filed contemporaneously herewith.

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February 18, 2022

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<sup>1</sup> Counsel for Defendants certify pursuant to D. Del. L.R. 7.1.1 that reasonable efforts were made to reach agreement with Counsel for IOENGINE. IOENGINE has stated that it will oppose this Motion.

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Plaintiff/Counterclaim  
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PAYPAL HOLDINGS, INC.,

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INGENICO INC.,

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v.

C.A. No. 18-826-WCB

IOENGINE, LLC,

Defendant.

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INGENICO, INC., INGENICO CORP., and  
INGENICO GROUP S.A.,

Counterclaim Defendants.

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**[PROPOSED] ORDER**

The Court, having considered Defendants' Joint Motion to Exclude the Testimony of Dr. Stec, as well as submissions related thereto;

IT IS HEREBY ORDERED this \_\_\_ day of February, 2022 that the Motion is Granted.

Dr. Stec's testimony is excluded for failure to apportion, improper reliance on a non-comparable license, and improper reliance on jury verdicts.

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The Honorable William C. Bryson

CERTIFICATE OF SERVICE

I hereby certify that on February 18, 2022, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on February 18, 2022, upon the following in the manner indicated:

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